

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	No. 23 CR 305
v.)	
)	Judge Steven C. Seeger
KEVIN CRUZ,)	

EXHIBIT A
(DEFENDANT’S SENTENCING MEMORANDUM)

NOW COMES the defendant, Mr. Kevin Cruz, by and through his attorney, Robert J. Kerr, of Lyon & Kerr, PLLC, and respectfully submits the following seventeen (17) pages as “Exhibit A” to *Defendant’s Sentencing Memorandum*, filed and served electronically via the CM/ECF system on February 20, 2025, before 5:30 p.m.

Respectfully submitted,

/s/ Robert J. Kerr

Robert J. Kerr
Attorney for Mr. Cruz
Lyon & Kerr, PLLC
36 S. Washington Street, Suite 201
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rkerr@lyonkerr.com
Illinois ARDC 6286581

February 17, 2025

Honorable Judge Steven C. Seeger,

I, Ana G. Cruz, am writing this letter to you to provide a reference to the character of my son, Kevin R. Cruz. I am confident that we instilled in Kevin integrity, responsibility and good values. I have observed Kevin excel in so many areas of his life, but I also fear that my husband and I were not able to adequately support Kevin in addressing his mental health.

At his core, Kevin is a wonderful person. He always excelled in the classroom, never missed a day of school, and received many awards. Kevin was a member of Honor Society and a recipient of the President's Award for Academic Achievement. Kevin's teachers always spoke highly of Kevin's academic performance, work ethic, and dedication to serving others. Apart from being an excellent student, Kevin truly enjoyed giving his time and attention to others as a volunteer at places like St. Alexis Hospital and PAWS.

During Kevin's his junior year of high school, Kevin began working as lifeguard. Kevin was as dedicated to his job as we was to his school and volunteer work. I observed Kevin to enjoy being recognized for his hard work, and to be gaining independence. However, I also observed a distinct change in Kevin around that time. He began to struggle with his mood and self-image. Although I wasn't aware of it then, I later learned that Kevin he was molested by an older man, someone that was his boss at his first job.

It wasn't until years later, after I had observed Kevin suffer mightily from anxiety and after I observed Kevin to be cutting himself, that Kevin told me about that experience with his former boss. Kevin explained that he withheld that horrific experience from his father and I because his former boss had threatened him. It broke my heart to discover why he had been suffering, and to learn why he wasn't able to confide in his family that loves him so dearly. After graduating from Schaumburg High School, and while he was enrolled at the University of Illinois, my husband, our older son, and I had to admit Kevin to Alexian Brothers Behavioral Health Hospital because Kevin expressed a desire to end his life.

I recognize that what my son did in this case was wrong, and I am not arguing that he should not be held responsible for his actions. However, I am convinced that despite Kevin's many hospitalizations he has never received appropriate medical care. I am confident that with proper diagnosis, treatment, and counseling Kevin will be able once again to conduct himself in a law-abiding manner and to make positive contributions to the community.

I pray that you exercise wisdom and mercy at Kevin's sentencing hearing. We appreciate the time and attention that you have dedicated to Kevin's case.

Very Truly Yours,

Ana G. Cruz
804 Osage Lane
Schaumburg, Illinois 60194
Anafrank1984@gmail.com

Christian Cruz
1125 Sumac Court
Bartlett, IL 60103
847-846-2949
Christiancruz72@gmail.com

February 16, 2025

To The Honorable Judge Steven C. Seeger

Re: Character and Support Reference for Kevin R Cruz

Your Honor,

I am writing to provide a character reference for Kevin R Cruz, a person I have known since his birth. I believe sharing my perspective as his oldest sibling is crucial when attempting to look back on the positive contributions and good character he once brought as a volunteer to several communities against the current shortcomings which have spiraled from his long-standing history of personal struggles with: multiple traumas from assaults, treatment and diagnosis issues, trust, and self-identity. Moreover, I respectfully request for leniency in his sentencing where the outcome would allow in some capacity the ability to establish a plan for: rehabilitation, therapy, and monitoring of his medicine, in-order to continue forging a track towards self-improvement.

Throughout the 34 years I have known Kevin, I have consistently witnessed his dedication to family and his passion for nursing with the generosity, and the unwavering kindness he gives to others. Kevin has always been a loyal family-oriented individual, placing a strong emphasis on communication with his loved ones as well as their well-being especially when it comes to ongoing health issues for both parents. The love and attention to detail he provides for his dogs is unmatched as he raises them as daughters. This commitment to family values is a testament to his character and his willingness to provide support to those he cares about. Through his: detainment, sentencing, and release, he will continue to have a close tight-knit family around to support him on his road back to self-improvement.

One of the many ways in which Kevin has demonstrated his generous spirit is through his volunteer work. He dedicated his time to a local non-profit organization called "Paws", which provides: clinics, shelter, adoption, and fostering services for homeless and abandoned pets. Kevin was also recognized with several leadership awards from different groups (including from LGQBT) when he attended the University of Illinois-

Urbana Champaign in 2009-2010. These acts of selfishness underscore his desire to give back to these communities and help those who may be experiencing difficult times.

I am aware of the personal challenges and difficulties that Kevin has faced both in the past and the present. I can attest that within our conversations he has shown remorse for his offenses and for all that he has lost. Over the past two years he has shared with me the immense stressors that overwhelm him then ultimately compromise his ability to cope with life's demands effectively. However, I firmly believe and support that Kevin has every intention of working towards self-improvement and moving beyond his past mistakes and trauma in a constrictive manner. I believe Kevin is now at the point where he can show sincerity when making amends. I further know that Kevin now accepts and knows he has done something wrong while understanding he needs to make reparations for it in some manner.

In his pursuit of personal growth and rehabilitation during detainment, Kevin has taken significant steps which include: setting up his own weekly book reading list and schedule, retaking interest in the Catholic religion via the bible, and attempting to learn a new language. These actions demonstrate his genuine commitment to overcoming his challenges and leading a healthier, more productive life while also reestablishing himself as a key contributor in helping society again.

Thank you for taking the time to read my letter.

Respectfully,

Christian Cruz

Oldest Brother

15 year employee at the Social Security Administration

Christine Cruz
1125 Sumac Court
Bartlett, IL 60103
847-347-2213
cdrews66@gmail.com

February 16, 2025

To The Honorable Judge Steven C. Seeger

Re: Character and Support Reference for Kevin R Cruz

Your Honor,

I am writing you today to share the relationship I have had with Kevin Cruz over the years, hoping to highlight the true nature of his character outside of the charges he currently faces. I first met Kevin 16 years ago when I began dating his older brother, Christian. At that time, Kevin was a senior in high school, preparing to graduate with honors. Kevin always showed a strong dedication to his studies and was an exceptional student. He went on to attend the University of Illinois with Christian and me, where I had the opportunity to get to know him better. Throughout college, I witnessed Kevin grow his passion for nursing and helping others. He spent his free time working at a bar/restaurant and volunteering for PAWS, which highlights his altruistic nature. His compassion for others is limitless and he has a strong desire to make a difference in the world.

Upon graduating college, Christian and I went on to get married and we started to grow our family. When it came time to select a godfather for our first child, Kevin was a clear choice and he gladly accepted. He has been such a present uncle for all 4 of our kids and he continues to be invested in their lives. Even through his incarceration, he remains a part of their lives, reaching out to them via letters and phone calls and asking daily how they are all doing.

Over the years, I observed Kevin's growing struggles with his mental health. He began experiencing anxiety and depression during his sophomore year of college and he never received the proper treatment to be able to manage either. I have since learned that his struggles with mental health have been exacerbated by traumas he suffered and never had the opportunity to heal from. He continues to seek treatment, but he will ultimately benefit from a proper diagnosis and treatment plan to be able to return to a valued member of society. Kevin recognizes his challenges and is dedicated to seeking

treatment and counseling. Whether through an inpatient program or outpatient therapy, Kevin comprehends the necessity of receiving treatment as soon as possible.

I am aware of the charges Kevin faces. I am also aware of Kevin's ownership of his wrongdoings and his acceptance of responsibility for his actions. He deeply regrets the course of events and wishes to make amends. I fully support Kevin in his path to reconciliation following this sentencing, whatever that may look like. I do, however, ask Your Honor to consider leniency in Kevin's sentencing so he can sooner seek the medical treatment he so badly needs. With treatment, I have no doubt he will return to the valued member of society he once was. Kevin is not alone in his journey: he has a large network of family and friends dedicated to his rehabilitation, in which I include myself. We are dedicated to ensuring he receives the necessary treatment and remains in such treatment for as long as needed.

Thank you for your time and please feel free to reach out to me if any additional information is needed.

Respectfully,

Christine Cruz

SUBJECT: CRUZ, KEVIN - Character & Support Letters (23-cr-00305)

February 16, 2025

To: The Honorable Judge Steven C. Seeger

Good day Your Honor:

I am writing today to provide a character reference in support for Kevin Cruz who is appearing before your court.

I, Therese Drews, have known Kevin Cruz for 12 years. Kevin's brother, Christian, dated and married my daughter, Christine. I first met Kevin when Christian started going out with Christine. Soon, I saw Kevin more often. He attended all family parties whether it was his family or ours. Both Christian, Kevin, and the entire Cruz family made my family feel welcomed and loved. Christmas was always the best; everyone was happy and celebrating. Kevin always brought gifts for all to the party on Christmas, no one was left out. Another party I attended was Kevin's graduation party that included many loving family members and loyal friends who wanted to celebrate his achievements. A good time was had by all laughing and catching up on the latest movies or tv shows. Kevin always engaged in the conversations and genuinely enjoyed seeing everyone.

Soon after this, I saw Kevin leave home to attend the University of Illinois. Christine, my daughter, attended the same school. When we would visit her, Kevin would arrange dinners out for us all, it was a good time to see Kevin and his brothers: Christian and Craig. These brothers were inseparable. They love being together and supportive of each other whenever they were in need of assistance. To me, their love for each other does not waver. Along with his brothers he also has the love and support of his mother, Ana and father, Frank, who provided a strong moral upbringing. Kevin is loved. Being such close family members, I believe the continued support will always be there for what Kevin needs. In my experience, Kevin Cruz, has consistently demonstrated honesty and compassion with those around him.

I cannot speak for his struggles or history of trauma; I am not in a position to do this. But the situation he is in is uncharacteristic of his usual conduct. I am aware that he has charges facing him and I think Kevin deeply regrets his involvement in these matters and that he has learned from the experience enough to want to be a better member of society.

My knowledge of Kevin's character is that he would be ready to get back to a career where he can help nurse or encourage others with his positive attributes from his medical training and his potential to rehabilitate. Please consider my perspective.

If there is any further information you may need regarding my plea to lighten his sentence, I will be available. My contact information is below. Thank you for hearing me.

Therese Drews

1506 Huntington Drive

Glenview, IL 6005

773-259-0744

February 17th, 2025

To Honorable Judge Steven C. Seeger,

I am writing to provide support for Kevin, whom I have had the privilege of knowing my whole life. He is my twin brother, and we grew up together. Kevin is an exceptional individual who consistently demonstrates hard work, intelligence, kindness, and a quiet strength of character.

As a student, Kevin was always at the top of his class, demonstrating an impressive work ethic and a natural ability to grasp complex concepts. His commitment to his studies is reflected in the honors he earned throughout his academic career, and his dedication to excellence is evident in every task he takes on. Kevin has never been satisfied with simply meeting expectations; he constantly pushes himself to be the best, striving for improvement in everything he does.

Beyond his academic success, Kevin has also been deeply involved in extracurricular activities. He was an active participant in the swim team. He has also volunteered his time at St. Alexis Hospital and PAWS, providing much-needed support to others in the community. His volunteer work is a testament to his generosity and his genuine desire to help those around him.

Kevin is a reserved individual, yet his actions speak volumes about his character. He is humble, kind, and deeply considerate of others. Though he may not seek the spotlight, Kevin's positive influence is undeniable. His dedication to helping others, coupled with his drive for personal excellence, makes him a standout individual in any setting. He loved spending time with friends and family whether that be at home or going out.

However, Kevin experienced a trauma that no one should have to face alone, and it has deeply impacted him. Over time, we noticed significant changes in his behavior. In an attempt to seek justice and support, Kevin went to the police to report that he had been raped. However, his experience was met with doubt, as the officers dismissed his complaint because of his size and gender. The person responsible for hurting Kevin was never held accountable; he even had the nerve to call our parents' house after the incident in search of Kevin. I believe that the trauma, anxiety, and shame that Kevin experienced contributed to Kevin's conduct in this case.

There were many heartbreaking moments when I witnessed Kevin struggle with his pain, and even attempted to harm himself. We thought that we did everything we could do to help Kevin, but the depth of Kevin's grief and the level of care he required was still unclear to us. Despite Kevin's challenges, I firmly believe that with proper mental health treatment, Kevin has the potential to heal and turn his mistakes and wrongdoing into a source of strength. Kevin can be restored as a valuable member of society, capable of making a lasting, positive impact.

Sincerely,

Craig Cruz

295 Forest View Ave, Wood Dale, IL, 60191

847-946-2047

Craigcruz71@gmail.com

February 17, 2025

To Honorable Judge Steven C. Seeger,

I have known Kevin Cruz for about 8 years now. He is my brother-in-law. I am married to Kevin's twin brother, Craig Cruz. I have had the opportunity to be around Kevin, and I've gotten to know Kevin throughout these years. I have come to know the good, and the not-so-good, parts of Kevin.

I learned about his past trauma of sexual assault, but I never linked that history to any of his behavior until recently. Kevin was always a quiet individual, but I know he enjoyed being in the company of his friends and family. For all the years I have known Kevin prior to his arrest, he was very dedicated to his nursing career, and he was always willing to help others. He offered his guest home to my husband and I while we were in between living situations. Kevin loves animals, especially his dogs and his family's dogs. Anytime Kevin went on vacation he came back with gifts for his family. Kevin has always been very thoughtful. These are just small examples of Kevin's big heart.

Over the past few years, I began to notice other aspects of Kevin's personality. I noticed Kevin struggle to maintain good mental health. The unlawful acts against Kevin by no means should be dismissed, but it should be well understood that Kevin suffered previous trauma, he began to associate with individuals that did not care for his well-being, and some of those individuals manipulated Kevin and took advantage of his kind heart.

I believe that Kevin's unhealed and mishandled trauma contributed to his conduct in this case. This is not the Kevin I have known. I believe that the restoration of Kevin's mental health must be his highest priority to avoid any future offenses. This should be a big awakening for Kevin, and an example of how misdiagnosed and mistreated mental health issues can cause otherwise well-educated and thoughtful individuals to act outside of their true character.

Sincerely,

Concetta Giralamo Cruz
295 Forest view Avenue
Wood Dale, Il, 60191
630-201-8984
Tina.giralamocruz@yahoo.com

Certification of Translation Accuracy

Translation of **Statement Letter 2** from **Spanish to English**

As an authorized representative of RushTranslate, a professional translation services agency, I hereby certify that the above-mentioned document has been translated by an experienced, qualified and competent professional translator, fluent in the above-mentioned language pair and that, in my best judgment, the translated text truly reflects the content, meaning, and style of the original text and constitutes in every respect a complete and accurate translation of the original document. This document has not been translated for a family member, friend, or business associate.

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A copy of the translation is attached to this certification.



Mike Bortscheller
Authorized Representative
Order Date: February 18, 2025

RushTranslate
640 South Fourth Street
Suite 300
Louisville, KY 40202
United States





Guadalajara, Jalisco, Mexico. February 17, 2025

Distinguished Judge:

My name is Guadalupe Ramírez Velasco, I am 81 years old, and I live in Mexico. I am Kevin Ryan Cruz's maternal grandmother, and I earnestly ask for your leniency in the sentencing of my grandson, whom I have known since he was a baby. I have coexisted with him on the various occasions when my daughter and my son-in-law brought him on vacations to Mexico, or when I went on vacations to the USA. My grandson is a boy with very good feelings, with moral values and very respectful of the entire family and people in general. During his studies he stood out for being one of the best, obtaining the highest grades. In his profession and other jobs, he has been very responsible and accomplished. He has a lot of talent for writing, a talent that he probably inherited from my husband, who was a professor.

Unfortunately, at my grandson's workplace for the last few years, he met unscrupulous people who abused his trust and good will; they cleverly involved him and without thinking about the consequences induced him to commit the faults of which he is accused. Kevin has had states of depression due to different situations that have arisen in his life, despite this, he has managed to move forward and never gave up.

Your Honor, I trust in your good judgment to resolve the opinion of my dear grandson, Kevin Ryan Cruz.

Without further ado and thanking you for your deference, receive warm greetings and feel free to reach out to me if you need further information.

Sincerely

Guadalupe Ramírez Velasco
Emilio Carranza 430
Colonial Tlaquepaque
San Pedro Tlaquepaque, Jalisco, Mexico. 45570
3334795231

Guadalajara, Jal. Mex. 17 de Febrero 2025

Distinguido Juez :

Mi nombre es Guadalupe Ramírez Velasco, tengo 81 años y vivo en México. Soy la abuela materna de Kevin Ryan Cruz, y pido encarecidamente su benevolencia en la sentencia de mi nieto, al cual conozco desde que era un bebé, he convivido con él en las diversas ocasiones en las mi hija y mi yerno lo traían de vacaciones a México, o cuando yo iba de vacaciones a USA. Mi nieto es un muchacho con muy buenos sentimientos, con valores morales y muy respetuoso con toda la familia y gente en general. En sus estudios, siempre destaco por ser de los mejores, obteniendo las más altas calificaciones. En su profesión y demás trabajos, ha sido muy responsable y cumplido. Tiene mucho talento para la escritura, talento que probablemente heredero de mi esposo, que en en vida fue catedrático. Desafortunadamente, donde estuvo trabajando mi nieto los últimos años, conoció a gente sin escrúpulos, que abusaron de su confianza y buena voluntad, lo envolvieron hábilmente y sin pensar en las consecuencias lo indujeron a cometer las faltas de las que se le acusa. Kevin, ha tenido estados de depresión, por diferentes situaciones que se le han presentado en la vida, a pesar de ello, ha logrado salir adelante y nunca se rinde.

Señor Juez, confío en su buen juicio para la resolución en el dictamen de mi querido nieto, Kevin Ryan Cruz.

Sin más por el momento y agradeciendo su deferencia, me despido y me pongo a su disposición.

Atentamente
Guadalupe Ramírez Velasco
Emilio Carranza 430
Colonial Tlaquepaque
San Pedro Tlaquepaque, Jal. Mex 45570
3334795231

Certification of Translation Accuracy

Translation of **Statement Letter 1** from **Spanish to English**

As an authorized representative of RushTranslate, a professional translation services agency, I hereby certify that the above-mentioned document has been translated by an experienced, qualified and competent professional translator, fluent in the above-mentioned language pair and that, in my best judgment, the translated text truly reflects the content, meaning, and style of the original text and constitutes in every respect a complete and accurate translation of the original document. This document has not been translated for a family member, friend, or business associate.

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A copy of the translation is attached to this certification.



Mike Bortscheller
Authorized Representative
Order Date: February 18, 2025

RushTranslate
640 South Fourth Street
Suite 300
Louisville, KY 40202
United States



Guadalajara, Jalisco Mexico, February 17, 2025

Honorable Judge:

I address you with all due respect asking for your clemency for the accused Kevin Ryan Cruz. My name is Omega Gizeh Gutiérrez Ramírez, I am Kevin's aunt, his mother's sister. I am 48 years old, of Mexican nationality and domiciled in Mexico.

I have known Kevin since he was 8 months old, it was at that time when his parents took him to Mexico so that the family on his mother's side could meet him and his twin brother. As a child, Kevin was very cheerful and calm, he enjoyed playing board games with his younger cousins and uncles. He was a student with excellent grades due to his great dedication and effort. I visited them on several occasions, at his parents', Ana and Frank, home in Schaumburg, Illinois. Kevin's behavior always was that of a normal child, with school and extracurricular activities, he had a certain sensitivity to play the piano; he had moments of leisure and moments in which he fought with his brothers.

During his adolescence and adulthood, Kevin had self-acceptance problems and also with the boys and girls around him, due to his sexual orientation, which made him live in constant depression and stress due to discrimination and rejection. Due to anxiety and fear of not knowing if his family would accept him, Kevin experienced a problem of sexual abuse at the age of 18 at his job, by a much older colleague. Kevin reported this, but the police did not believe him and only made fun of him. He kept quiet about what happened for a long time for fear of criticism and mockery; and so as not to worry his family.

Kevin is a man of good feelings and a big heart, that is why bad people have abused his generosity. In 2017, Kevin came to Mexico on vacation. Two of my nieces found an abandoned puppy on the street and brought it home. The moment he saw it, he was moved and adopted it; he made all the necessary procedures to take it to his home in Chicago. This speaks of his great humanity towards animals as well.

Mr. Judge, I appreciate your attention and availability towards this case.

Sincerely

Omega Gizeh Gutiérrez Ramírez
Emilio Carranza 430
Colonial Tlaquepaque, Jalisco, Mexico. 45570
3921060695
Betty.boop1912@hotmail.com

Guadalajara, Jal. Mex. 17 de Febrero 2025

Honorable Juez:

Me dirijo a usted con el debido respeto, solicitando su clemencia para el acusado Kevin Ryan Cruz. Mi nombre es Omega Gizeh Gutiérrez Ramírez, soy tía de Kevin, hermana de su mamá. Tengo 48 años, de nacionalidad y residencia mexicana.

Conozco a Kevin desde los 8 meses de edad, fue el tiempo en que sus padres lo llevaron a México para que la familia del lado materno lo conociera junto a su hermano gemelo. Kevin, de pequeño era un niño muy risueño y tranquilo, disfrutaba de los juegos de mesa con los primos y tíos más jóvenes de la familia. Fue un estudiante de excelentes calificaciones, por su gran dedicación y esfuerzo. Yo llegué a visitarlos en varias ocasiones, en el domicilio de sus padres Ana y Frank, en Schaumburg, Illinois. El comportamiento de Kevin siempre fue el de un niño normal, con sus actividades escolares y extra escolares con cierta sensibilidad para tocar el piano, tenía ratos de ocio y ratos en los que peleaba con sus hermanos. Kevin en su adolescencia y edad adulta tuvo problemas de aceptación propia y también por los chic@s de su entorno, debido a su orientación sexual, lo que le hizo vivir en una depresión constante y estrés por la discriminación y el rechazo. La ansiedad y el miedo de no saber si su familia lo aceptaría. Kevin vivió un problema de abuso sexual a los 18 años en su trabajo, por un compañero mucho mayor que él, Kevin fue a denunciar, pero la policía no le creyó y solo se burlaron de él. Calló lo sucedido por mucho tiempo por temor a las críticas y burlas; y para no preocupar a su familia. Kevin es un hombre de buenos sentimientos y gran corazón, por eso la gente mala ha abusado de su generosidad. En el 2017, Kevin vino de vacaciones a México, 2 de mis sobrinas encontraron un cachorro abandonado en la calle y lo trajeron a casa, en el momento en que él lo vio se conmovió y lo adoptó, consecuentemente realizo los trámites necesarios para llevárselo a su domicilio en Chicago, eso habla de su gran humanidad también hacia los animalitos.

Sr. Juez, agradezco su atención y disponibilidad ante este caso.

Atentamente

Omega Gizeh Gutiérrez Ramírez

Emilio Carranza 430

Colonial Tlaquepaque, Jal. Mex. 45570

3921060695

Betty.boop1912@hotmail.com

Derek Weseen
dweseen@gmail.com
(847) 894-3771
02/12/2025

Honorable Judge Steven C. Seeger,
Re: Character Reference for Kevin Cruz

Dear Honorable Judge Seeger,

My name is Derek Weseen, and I have known Kevin Cruz for 25 years. We first met as members of a wrestling club and later reconnected in high school, where we attended the same school. Over the years, I have come to know Kevin as a hardworking and intelligent individual. He has always been an exceptional student, maintaining straight A's and earning honors throughout his academic career.

One particular moment that stands out to me is when I found myself stranded and in need of a ride. Without hesitation, Kevin went out of his way to pick us up, demonstrating his reliability and willingness to help others. This is just one example, but I can recall numerous occasions where Kevin has stepped up to assist those around him without expecting anything in return. His kindness and sense of responsibility have always been evident to me.

I firmly believe that Kevin has the ability and support system necessary to learn from this experience and better himself. He is surrounded by people who care for him and want to see him succeed. I have no doubt that given the opportunity, Kevin will take the necessary steps toward rehabilitation and personal growth.

Thank you for your time and consideration. Please feel free to reach out if you need any further information.

Sincerely,
Derek Weseen

CERTIFICATE OF SERVICE

The undersigned, Robert J. Kerr, hereby certifies that - in accordance with Fed.R.Crim.P. 49, Fed.R.Civ.P.5, and the General Order on Electronic Case Filing (ECF) - a true and correct copy of “Exhibit A” to the *DEFENDANT’S SENTENCING MEMORANDUM* was served via the CM/ECF system upon the United States Attorney’s Office for the Northern District of Illinois, and other parties of record, on February 20, 2025, before 5:30 p.m.

Respectfully submitted,

/s/ Robert J. Kerr

Robert J. Kerr

Attorney for Mr. Cruz

Lyon & Kerr, PLLC

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Hinsdale, Illinois 60521

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Office: 312-955-4400

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